

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

| | |
|---|--------------------|
| <p>BASED POLITICS, INC., <i>Petitioner,</i></p> <p>v.</p> <p>MERRICK B. GARLAND, in his official capacity as Attorney General of the United States, <i>Respondent.</i></p> | <p>No. 24-1183</p> |
| <p>TIKTOK INC. and BYTEDANCE LTD., <i>Petitioners,</i></p> <p>v.</p> <p>MERRICK B. GARLAND, in his official capacity as Attorney General of the United States, <i>Respondent.</i></p> | <p>No. 24-1113</p> |

BRIAN FIREBAUGH, CHLOE
JOY SEXTON, TALIA CADET,
TIMOTHY MARTIN, KIERA
SPANN, PAUL TRAN,
CHRISTOPHER TOWNSEND,
and STEVEN KING,
Petitioners,

No. 24-1130

v.

MERRICK B. GARLAND, in his
official capacity as Attorney
General of the United States,
Respondent.

**BASED POLITICS, INC.'S OPPOSITION TO RESPONDENT'S
MOTION FOR LEAVE TO FILE MATERIALS *EX PARTE* AND
CROSS-MOTION IN THE ALTERNATIVE FOR APPOINTMENT
OF A SPECIAL MASTER**

Petitioner BASED Politics Inc. adopts and incorporates by reference the TikTok Petitioners' Opposition to the Government's Motion for Leave to File Materials *Ex Parte* and Cross-Motion in the Alternative for Appointment of a Special Master.

Respectfully submitted,

August 5, 2024

/s/ Jacob Huebert
LIBERTY JUSTICE CENTER
13341 W. U.S. Highway 290
Building 2
Austin, Texas 78737

512-481-4400
jhuebert@ljc.org

*Counsel for Petitioner
BASED Politics, Inc.*

CERTIFICATE OF COMPLIANCE

This response complies with the type-volume limitation of D.C. Circuit Rule 27(c) because it contains 35 words, excluding the parts of the brief exempted by Federal Rule of Appellate Procedure 32(f).

This response complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type style requirements of Federal Rule of Appellate Procedure 32(a)(6) because it has been prepared in a proportionally spaced typeface using Microsoft Word in 14-point, Century Schoolbook font.

August 5, 2024

/s/ Jacob H. Huebert

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit by using the appellate CM/ECF system on August 5, 2024.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

August 5, 2024

/s/ Jacob Huebert
LIBERTY JUSTICE CENTER
13341 W. U.S. Highway 290
Building 2
Austin, Texas 78737
512-481-4400
jhuebert@ljc.org

*Counsel for Petitioner
BASED Politics, Inc.*